

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

WINERIES OF THE OLD MISSION
PENINSULA (WOMP) ASSOC., a Michigan
Nonprofit Corporation, et al.,

Plaintiffs,

v

PENINSULA TOWNSHIP, Michigan Municipal
Corporation,
Defendant.

Case No: 1:20-cv-01008

Honorable Paul L. Maloney
Magistrate Ray S. Kent

ORAL ARGUMENT REQUESTED

MILLER, CANFIELD, PADDOCK
AND STONE, PLC
Attorneys for Plaintiffs
Joseph M. Infante (P68719)
Stephen M. Ragatzki (P81952)
Christopher J. Gartman (P83286)
99 Monroe Avenue NW, Suite 1200
Grand Rapids, MI 49503
(616) 776-6333
infante@millercanfield.com
gartman@millercanfield.com

FOLEY & MANSFIELD, P.L.L.P.
Attorneys for Defendant
Gregory M. Meihn (P38939)
Matthew T. Wise (P76794)
130 East 9 Mile Road
Ferndale, MI 48220-3728
(248) 721-4200 / Fax: (248) 721-4201
gmeihn@foleymansfield.com
mwise@foleymansfield.com

PLAINTIFFS' MOTION TO COMPEL

Plaintiffs, WINERIES OF THE OLD MISSION PENINSULA (WOMP) ASSOC., BOWERS HARBOR VINEYARD & WINERY, INC, BRY'S WINERY, LLC, CHATEAU GRAND TRAVERSE, LTD, CHATEAU OPERATIONS, LTD, GRAPE HARBOR, INC., MONTAGUE DEVELOPMENT, LLC, OV THE FARM, LLC, TABONE VINEYARDS, LLC., TWO LADS, LLC, VILLA MARI LLC, WINERY AT BLACK STAR FARMS, L.L.C., (collectively the "Wineries"), by and through their attorneys, Miller, Canfield, Paddock and Stone, P.L.C. move pursuant to Federal Rule of Civil Procedure 37 for an order compelling Defendant Peninsula Township to fully respond to documents requests. Peninsula Township has demonstrated it does not intend to fully cooperate in discovery as this is the Wineries' third motion

to compel discovery and the Wineries have also filed a motion for sanctions given Peninsula Township's violation of a prior discovery order issued by this Court. As such, the Wineries also request their costs and fees, including attorney fees, incurred in bringing this motion. The parties have met and conferred pursuant to Federal Rule of Civil Procedure 37(a)(1) and LCivR 7.1(d) but were unable to fully resolve the issue. In support of this motion, including the specific relief sought with respect to each discovery request, the Wineries rely on the accompanying brief and attached exhibits.

WHEREFORE, the Wineries respectfully request that the Court grant this Motion to Compel and award them their costs and attorney fees incurred in bringing this Motion.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By: /s/ Joseph M. Infante

Joseph M. Infante (P68719)
Stephen M. Ragatzki (P81952)
Christopher J. Gartman (P83286)
99 Monroe Avenue NW, Suite 1200
Grand Rapids, MI 49503
(616) 776-6333

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